1 MILES EHRLICH (Bar No. 237954) miles@ramsey-ehrlich.com 2 ISMAĬL RAMSEY (Bar No. 189820) izzy@ramsey-ehrlich.com 3 AMY CRAIG (Bar No. 269339) amy@ramsey-ehrlich.com 4 RAMSEY & EHRLICH LLP 803 Hearst Avenue 5 Berkeley, CA 94710 (510) 548-3600 (Tel) 6 (510) 291-3060 (Fax) 7 Attorneys for Non-Party Anthony Levandowski 8 9 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 12 Case No.: 3:17-cv-00939 WHA WAYMO LLC, 13 NON-PARTY ANTHONY Plaintiff, LEVANDOWSKI'S ADMINISTRATIVE 14 MOTION TO FILE UNDER SEAL A v. PORTION OF HIS LETTER BRIEF 15 UBER TECHNOLOGIES, INC., et al., 16 Defendants. 17 18 19 20 Pursuant to Civil L.R. 7-11 and 79-5, Non-Party Anthony Levandowski respectfully requests to file under seal information in his Letter Brief Moving to Quash Waymo's Subpoena 21 to Stroz Friedberg (the "Letter Brief"), filed concurrently herewith. Specifically, Mr. 22 23 Levandowski requests an order granting leave to file under seal the portions of the Letter Brief 24 listed below: **Portion to Be Filed Designating Party** 25 **Document** 26 **Under Seal** 27 Letter Brief Highlighted in Blue Defendants

NON-PARTY ANTHONY LEVANDOWSKI'S ADMINISTRATIVE MOTION TO SEAL Case No. 3:17-00939-WHA

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I. LEGAL STANDARD

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Civil Local Rule 79-5 requires that a party seeking sealing "establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law" (i.e., is "sealable"). Civil L.R. 79-5(b). The sealing request must also "be narrowly tailored to seek sealing only of sealable material." Id.

II. **UBER'S CONFIDENTIAL INFORMATION**

Mr. Levandowski seeks to seal a portion of the Letter Brief because he understands from the parties' prior filings that Defendants have designated that information confidential, and accordingly Plaintiff Waymo has asked the Court to seal references to it in a filing on June 3, 2017. Dkt. Nos. 545; 545-1 Declaration of Patrick Schmidt ("Schmidt Decl.") ¶ 3.

III. **CONCLUSION**

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Mr. Levandowski respectfully requests that the Court grant his Administrative Motion.

Date: June 9, 2017 Respectfully submitted,

> Miles Ehrlich Ismail Ramsey Amy Craig Ramsey & Ehrlich LLP

Counsel for Non-Party Anthony Levandowski